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7 *Attorneys for Defendant*  
8 *J.C.M. Industries, Inc. dba Advance Storage*  
*Products*

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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 QUINTON DRUMMER, STEFFAN  
13 WEBB, and DEMONTRAY  
14 STALLWORTH, individually, and on  
behalf of all others similarly situated,

15 Plaintiffs,

16 vs.

17 ALPHA TEAM CONSTRUCTION  
CORPORATION, BG CONSTRUCTION  
18 SERVICES, LLC, HECTOR BELTRAN,  
and J.C.M. INDUSTRIES, INC., doing  
19 business as ADVANCE STORAGE  
PRODUCTS, jointly and severally,

20 Defendants.

Case No.: 2:18-cv-01251-RFB-NJK

**STIPULATION AND ORDER TO EXTEND  
TIME TO FILE AMENDED JOINT  
PROPOSED DISCOVERY PLAN AND  
SCHEDULING ORDER  
(First Request)**

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22 Defendant J.C.M. Industries, Inc. doing business as Advance Storage Products ("JCM"),  
23 by and through its counsel, Jackson Lewis P.C., Plaintiffs Quinton Drummer, Steffan Webb and  
24 Demontray Stallworth ("Plaintiffs"), by and through their counsel, Wolf, Rifkin, Shapiro,  
25 Schulman & Rabkin, LLP, and Defendant Hector Beltran, in proper person, hereby submit this  
26 stipulation to extend to submit their joint proposed discovery plan and scheduling order.

27 Plaintiffs served their First Amended Collective and Class Action Complaint on JCM on  
28 July 5, 2019, adding JCM as a Defendant to this action. The parties stipulated to extend JCM's

1 deadline to answer or otherwise respond to Plaintiff's First Amended Collective and Class Action  
2 Complaint to August 26, 2019. The parties believe that more meaningful discussions regarding  
3 scope of discovery may be had after the filing of JCM's responsive pleading. The parties seek an  
4 extension through and including September 9, 2019 to file their proposed Discovery Plan and  
5 Scheduling Order. This extension will provide the parties with two weeks to confer regarding the  
6 scope of discovery based on JCM's responsive pleading and any defenses asserted.

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1 **STIPULATION**

2 NOW THEREFORE, the parties hereby agree and stipulate as follows:

3 The deadline for filing the parties' Amended Joint Proposed Discovery Plan and  
4 Scheduling order be continued to September 9, 2019. This stipulation and order is sought in good  
5 faith and not for the purpose of delay.

6 Dated this 14th day of August, 2019.

7 WOLF, RIFKIN, SHAPRIO, SCHULMAN  
8 & RABKIN, LLP

JACKSON LEWIS P.C.

9 /s/ Charles R. Ash, IV

/s/ Daniel I. Aquino

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16  
17 /s/ Hector Beltran

18 Hector Beltran  
19 BG Construction Services, LLC  
9775 Hightower Road  
Roswell, GA 30075  
20 *Defendant, in proper person*

21 **IT IS SO ORDERED.**

22 Dated this 15 day of August, 2019.

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25 MAGISTRATE JUDGE  
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